

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

Chapter 11  
Case No. 08-13555 (JMP)

In re

LEHMAN BROTHERS INC.,

Debtor.

Case No. 08-01420 (JMP) SIPA

**STIPULATION AND [PROPOSED] ORDER REGARDING OBJECTION TO  
PORTIONS OF PROOFS OF CLAIM NO. 66462 AGAINST LEHMAN BROTHERS  
HOLDINGS INC. AND NO. 4939 AGAINST LEHMAN BROTHERS INC. OF  
JPMORGAN CHASE BANK, N.A. REGARDING TRIPARTY REPO-RELATED  
LOSSES AND MOTION TO UNSEAL SAME**

This Stipulation is entered into by and between the undersigned counsel, acting for and on behalf of their respective clients: (a) Lehman Brothers Holdings Inc. ("LBHI"), (b) the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc. (the "Committee" and, together with LBHI, the "Objectors"); and (c) JPMorgan Chase Bank, N.A. ("JPMorgan" and, together with LBHI and the Committee, the "Parties" and each a "Party").

WHEREAS, on September 15, 2008 LBHI commenced a voluntary case under chapter 11 of title 11 of the United States Code as amended in the United States Bankruptcy Court for the Southern District of New York (the "Court" and the proceeding the "LBHI Bankruptcy Case");

WHEREAS; on September 19, 2008, the Honorable Gerard E. Lynch, Judge of the United States District Court for the Southern District of New York, entered the Order Commencing Liquidation pursuant to the provisions of the Securities Investor Protection Corporation Act with respect to Lehman Brothers Inc. (the resulting proceeding the "LBI SIPA Proceeding");

WHEREAS, on May 29, 2009, JPMorgan filed Proof of Claim No. 4939 in the LBI SIPA Proceeding;

WHEREAS, on April 1, 2010, JPMorgan filed Claim No. 66462 in the LBHI Bankruptcy Case;

WHEREAS, on August 31, 2011, Objectors filed their Objection to Portions of Proofs of Claim No. 66462 Against Lehman Brothers Holdings Inc. and No 4939 Against Lehman Brothers Inc. of JPMorgan Chase Bank, N.A. Regarding Triparty Repo-Related Losses (the "Deficiency Objection") with certain text and exhibits redacted pursuant to the Confidentiality Stipulation and Protective Order so ordered by the Court in the LBHI Bankruptcy Case on September 1, 2010;

WHEREAS, on August 31, 2011, Objectors filed their Motion, Pursuant to 11 U.S.C. 105(a) and 107(a) to Unseal Objection to Portions of Proofs of Claim No. 66462 Against Lehman Brothers Holdings Inc. and No 4939 Against Lehman Brothers Inc. of JPMorgan Chase Bank, N.A. Regarding Triparty Repo-Related Losses (the "Motion to Unseal");

WHEREAS, the Parties have since negotiated a resolution of the Motion to Unseal whereby JPMorgan has agreed that the Deficiency Objection and all exhibits attached thereto can be filed publicly with only the following redactions: (1) the names, account numbers and other identifying information of counterparties to trades with JPMorgan, (2) telephone

numbers, (3) email addresses, except where the email address is the only indication of the identity of the sender or recipient of an email in which event the portion of the email address necessary to identify the sender or recipient will not be redacted, and (4) nine lines of the email attached to the Deficiency Objection as Exhibit W unrelated to the substance of the Deficiency Objection;

WHEREAS, concurrently herewith, Objectors have publicly re-filed the confidential version of the Deficiency Objection and the exhibits attached thereto with only the redactions agreed upon through this Stipulation;

WHEREAS, the Parties have agreed that JPMorgan should have until November 15, 2011 to file its response to the Deficiency Objection;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND UPON COURT APPROVAL HEREOF, IT IS ORDERED THAT:

- 1) The content redacted from the version of the Deficiency Objection and the exhibits attached thereto re-filed by Objectors pursuant to this Stipulation is ordered sealed;
- 2) The Motion to Unseal is hereby withdrawn and shall have no further force or effect, and the October 19, 2011 hearing on the Motion to Unseal is ordered off calendar;
- 3) The October 19, 2011 hearing on the Deficiency Objection is hereby adjourned until December 14, 2011 or such other time as agreed upon by the Parties, and JPMorgan shall have until November 15, 2011 to file its response to the Deficiency Objection.

DATED: October 11, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Erica Taggart

Erica Taggart

Tyler G. Whitmer

*Counsel for the Official Committee of Unsecured  
Creditors of Lehman Brothers Holdings Inc.*

DATED: October 11, 2011

CURTIS, MALLET-PREVOST, COLT & MOSLE  
LLP

By /s/ Joseph D. Pizzurro

Joseph D. Pizzurro

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*Counsel for Debtor Lehman Brothers Holdings  
Inc.*

DATED: October 11, 2011

WACHTELL, LIPTON, ROSEN & KATZ

By /s/ Ian Boczko

Paul Vizcarrondo

Amy R. Wolf

Ian Boczko

*Counsel for JPMorgan Chase Bank, N.A.*

**IT IS SO ORDERED:**

Dated: \_\_\_\_\_, 2011

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JAMES M. PECK

United States Bankruptcy Judge